STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF NORTHERN INDIANA PUBLIC SERVICE COMPANY FOR AUTHORITY TO MODIFY ITS RATES AND CHARGES FOR ELECTRIC UTILITY SERVICE AND FOR APPROVAL OF: (1) CHANGES TO ITS ELECTRIC SERVICE TARIFF INCLUDING A NEW SCHEDULE OF RATES AND CHARGES AND CHANGES TO THE GENERAL RULES AND REGULATIONS AND CERTAIN RIDERS; (2) REVISED DEPRECIATION ACCRUAL RATES; (3) INCLUSION IN ITS BASIC RATES AND CHARGES OF THE COSTS ASSOCIATED WITH CERTAIN PREVIOUSLY APPROVED QUALIFIED POLLUTION CONTROL PROPERTY, CLEAN COAL TECHNOLOGY, CLEAN ENERGY PROJECTS AND FEDERALLY MANDATED COMPLIANCE PROJECTS; AND (4) ACCOUNTING RELIEF TO ALLOW NIPSCO TO DEFER, AS A REGULATORY ASSET OR LIABILITY, CERTAIN COSTS FOR RECOVERY IN A FUTURE PROCEEDING.	)	**CAUSE NO. 44688**

COMPLIANCE FILING
PERFORMANCE METRIC COLLABORATIVE UPDATE

Ordering Paragraph 10 of the Indiana Utility Regulatory Commission's July 18, 2016 Order issued in this Cause ("Rate Case Order") directed Northern Indiana Public Service Company LLC ("NIPSCO") to participate in a collaborative for the purpose of implementing performance metrics. The Commission ordered that

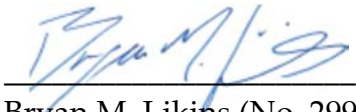
NIPSCO shall keep the Commission apprised of the progress of the collaborative through compliance filings made under this Cause as described in its Order as follows:

> [W]e find that NIPSCO shall facilitate a meeting with interested stakeholders within six weeks of the effective date of the Order in this Cause to collaborate on a path for moving forward with a performance metrics initiative.
>
> * * *
>
> In order that the Commission and interested stakeholders may stay abreast of the collaborative process, we direct NIPSCO to make a progress update filing with the Commission within 90 days of the initial meeting of the collaborative. We also order NIPSCO to file quarterly reports for the first year and an annual report by July 1, 2017, and for each year thereafter until otherwise indicated by the Presiding Officers.

Attached please find NIPSCO's Performance Metric Collaborative Report dated July 1, 2020, which incorporates revisions and language as provided by the interested stakeholders participating in NIPSCO's Performance Metrics Collaborative.

NIPSCO will file an annual Performance Metrics Collaborative Report for each year hereafter until otherwise indicated by the Presiding Officers.

Respectfully submitted:



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The undersigned hereby certifies that the foregoing was served by email transmission upon the following:

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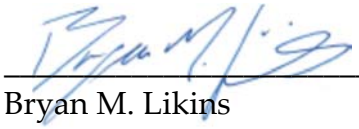
Dated this 1st day of July, 2020.



Bryan M. Likins

July 1, 2020

Via Electronic Filing
Honorable James F. Huston
Chair
Indiana Utility Regulatory Commission
101 West Washington Street
Suite 1500 East
Indianapolis, Indiana 46204

RE: Cause No. 44688; Compliance Filing – Performance Metric Collaborative Update

Dear Chair Huston:

Enclosed please find the 2020 Performance Metric Collaborative Report prepared by Northern Indiana Public Service Company LLC ("NIPSCO"). As in previous years, NIPSCO provided the stakeholders involved in Cause No. 44688 with the opportunity to review and comment on the document, but the information was compiled by NIPSCO. The first two pages of the report provide an overview of the 2019 results and the appendix includes the data utilized in developing the graphs.

NIPSCO appreciates the participation of the stakeholders, particularly during the June 23, 2020 meeting to review the 2019 results. Please contact me if you have any questions or concerns.

Sincerely,

Erin E. Whitehead
Vice President, Regulatory and Major Accounts

Encl.
cc: (w/ encl. – via email transmission) to Service List in Cause No. 44688

PERFORMANCE METRIC REPORT

2019

Northern Indiana Public Service Company LLC

July 1, 2020

Performance Metric Report

INTRODUCTION

This document is the fourth performance metric report Northern Indiana Public Service Company LLC (NIPSCO) has submitted to the Indiana Utility Regulatory Commission (Commission or IURC) in compliance with the Commission's July 18, 2016 Order in Cause No. 44688. The purpose of this report is to communicate NIPSCO's performance in areas such as safety, reliability, customer service, and operations. This 2019 submission contains the same data sets used in the prior reports and expands on these to enable interested stakeholders, the Commission, and NIPSCO, to understand and utilize key metrics. NIPSCO strives to deliver customer value in a balanced manner across four key dimensions – safety, safety, customer experience, being a great place to work, and affordability.

Safety. NIPSCO again achieved its best ever performance related to underground damages, surpassing the record achieved in 2018. During 2019, NIPSCO placed in the second quartile for vehicle safety nationwide. In addition, NIPSCO furthered its efforts to protect its employees, contractors, customers, and communities through the final implementation stages of the Safety Management System (SMS) for its gas business. Although started as a gas initiative, all employees have been trained in and adopted the principles of this system, adding rigor to work processes and helping NIPSCO address risks before they become issues. The electric SMS initiative kicked off in 2020.

Reliability. NIPSCO has seen benefits from its focus on improving reliability, although there was an uptick in severe weather in 2019 that exceeded the system design criteria. Considering reliability metrics from an all-inclusive perspective (including major event days), NIPSCO has demonstrated significant long-term improvement in its reliability indices from a high in 2014. The Company's focus on vegetation management resulted in a reduction of tree-related outages.

Customer Service. NIPSCO continues to enjoy relative stability with the transactional customer satisfaction score. Noteworthy this year, J.D. Power scores for both residential and electric customer satisfaction again reflected new high scores for the Company. While a total of 98 IURC complaints were filed by customers in 2019, NIPSCO continued its trend of zero substantiated complaints for the year.

Investment and Spending. NIPSCO realized a reduction in several O&M cost metrics in 2019. Due to continuous improvement efforts at both NiSource and NIPSCO, the Company continues to drive down costs per retail customer where possible.

Affordability. In June 2018, NIPSCO launched a new program that allows for customers to make payments over the telephone while the technician is on-site to complete the disconnection, thereby providing a final opportunity to avoid disconnection. Both the number of mailed notices regarding disconnections for non-payment and the number of actual disconnections for non-payment again decreased in 2019.

NIPSCO is committed to continuous improvement of its various processes. NIPSCO looks forward to continued improvement in 2020.

SAFETY

Safety is NIPSCO's top priority and a core value of the organization. The Company's safety policies reflect a "just culture" mindset, which is a model used by high consequence industries to improve the way they approach system safety and staff accountability.

Organizations foster a just culture by looking first at systematic issues rather than individual performance. This approach recognizes that all employees err, and therefore a company should design its systems and procedures so that when an error occurs, injuries are limited due to multiple layers of protection. This is the "Fail Safely" approach incorporated by the Company.

NIPSCO employees have increasingly embraced safety initiatives through the past few years. Three metrics used by the Company to measure its safety efforts are discussed below.

Vehicle Safety

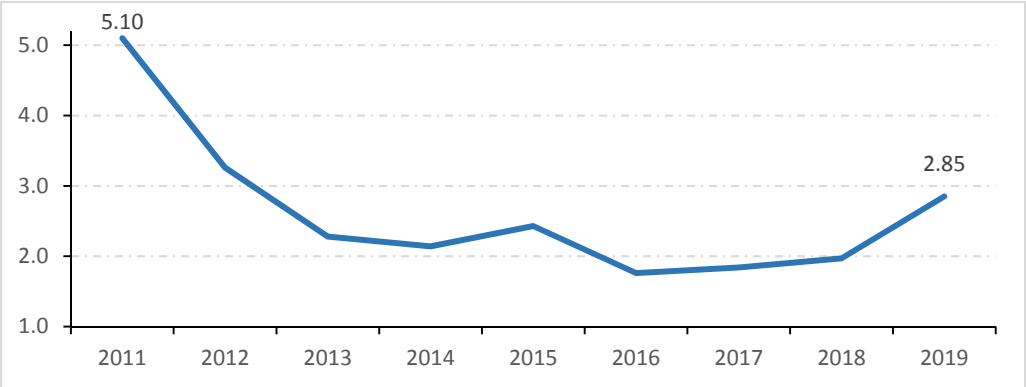
All employees authorized to operate company vehicles must complete a Smith System defensive driver training program. Supervisors conduct observation rides with those employees to reinforce safe driving behaviors. All NIPSCO employees must pass multiple computer-based learning modules each year that focus on the unique, seasonal driving hazards.

In 2018, NIPSCO installed GreenRoad telematics in all of its fleet vehicles. This system gives real-time feedback to the driver when unsafe driving practices, such as hard braking or excessive speed, are detected and sends certain information regularly to the Company for corrective follow-up. After deploying GreenRoad telematics in all of NIPSCO's fleet vehicles, the Company has seen significant improvement in its safety, management, and emergency response metrics. Safety telematics will continue to be part of overall fleet management, work management, and safety strategy. However, NIPSCO will continue to make program adjustments to further increase the viability and sustainability of the telematics technology. An ice event that occurred in January 2019 led to an increase in crashes, as well as an increase in hit fixed objects and rear end collisions. To address these increases, among other actions, GreenRoad telemetric data was made more regularly available via Supervisor Scorecard and Hot Spot reports to help leaders identify high risk employees and roadways.

Figure 1 illustrates NIPSCO's *preventable vehicle crash rate*, which represents the number of crashes per one million miles driven in which any employee, while driving on Company business, failed to do everything reasonably possible to avoid a collision. This metric is combined for gas and electric. A major ice storm in January 2019 was the reason for a high number of preventable vehicle crashes at the start of the year. NIPSCO continues to focus on decreasing these accidents.

NIPSCO benchmarks this metric against American Gas Association (AGA) data for combination utilities. NIPSCO is in the second quartile in this category.

Figure 1. Preventable vehicle crash rate



Field Safety

NIPSCO strives to make safety a foremost priority for its employees every day. In the office, managers are encouraged to begin each meeting with a safety moment so that safe working practices become engrained in the Company's culture. A *MeetSAFE* document, which states emergency information, such as the nearest exit, the building's address, and individuals qualified to perform CPR, is present in each of the Company's meeting rooms. Field employees conduct a job hazard analysis before work each day. This includes the identification of unique site hazards, required personal protective equipment, energy control, and critical work procedures. Local management then reviews these analyses to follow up on any potential operating issues.

Figure 2 illustrates the two metrics NIPSCO uses to measure employee safety in the field for electric employees in the generation and power delivery divisions.

Figure 2. Employee injuries – Generation and Power Delivery Divisions

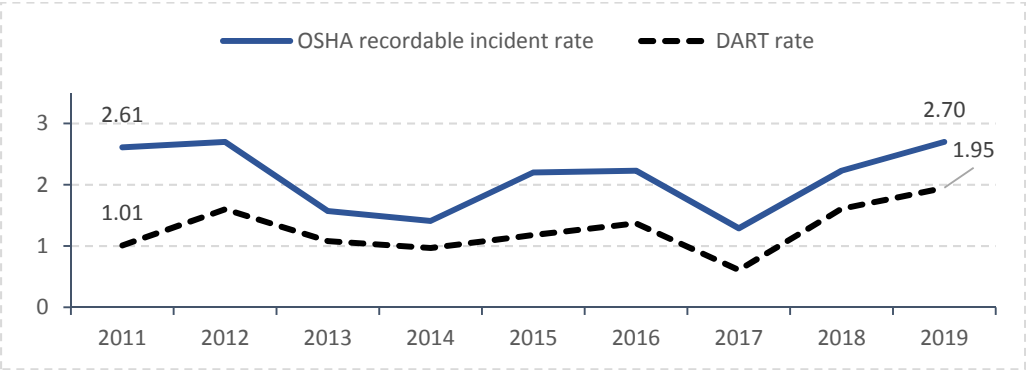
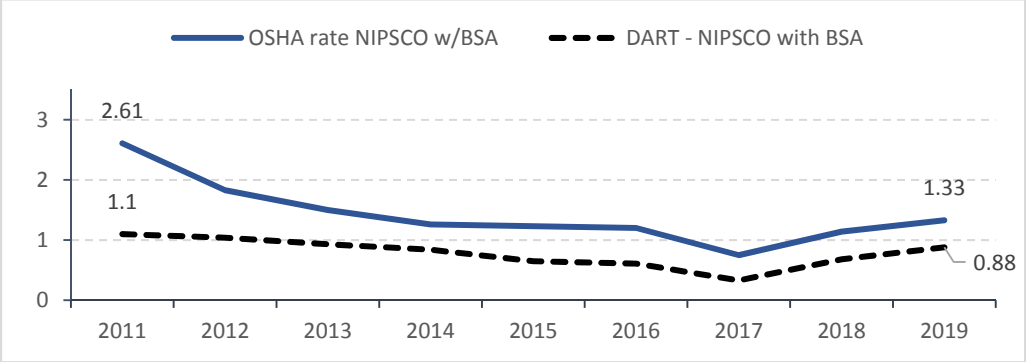


Figure 3 illustrates the two metrics NIPSCO uses to measure employee safety in the field for all NIPSCO employees.

Figure 3. Employee injuries – NIPSCO with Business Service Allocation



The *OSHA recordable incident rate* represents the number of recordable injury or illness cases for every 100 full-time employees. Most injuries or illnesses that require more than first aid treatment are recordable.

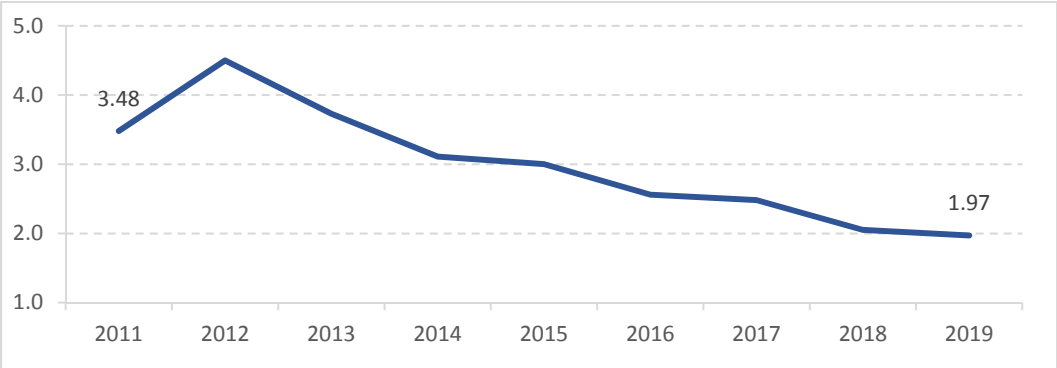
The *days away, restricted, or transferred (DART)* metric represents the number of injury and illness cases requiring days away, restricted duty, or job transfer for every 100 full-time employees. This number indicates the rate of injuries that result in an employee being unable to perform its typical job requirements.

NIPSCO continues to address issues related to safety, including conducting a campaign focused on "slips, trips, and falls" in NIPSCO's generating stations, as those were determined to be a significant source of injuries. Another example is a High Risk Activity / Infrequent Task program where NIPSCO has identified certain activities that require additional support from safety advocates, coordinators and supervisors engaging in the Pre-Job Briefing and then following up with the crews with observations. These are just two examples of a comprehensive commitment to improve safety throughout the organization.

Customer Safety

The *underground damages* metric represents the number of reported gas and electric damages divided by the number of locate tickets established through the 811 process received multiplied by 1,000. NIPSCO reports this information to the federal Pipeline and Hazardous Materials Safety Administration (PHMSA). Underground damages continues to be a major area of focus for NIPSCO, as indicated by the continuing downward trend in the metric.

Figure 4. Underground damages per 1000 locates



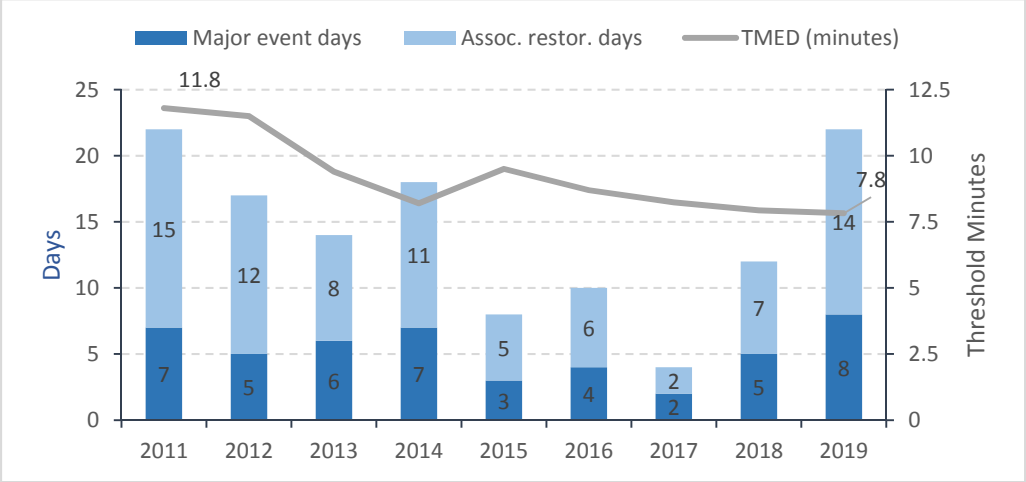
RELIABILITY

Power Delivery

A *major event day* (MED) is a day on which a weather or operational event causes a utility's daily System Average Interruption Duration Index (SAIDI) to exceed a calculated threshold (TMED).[1] A single event may cause multiple MEDs, and power outages may remain for days after the event is over.

Figure 5 illustrates the number of MEDs in NIPSCO's service territory, the number of restoration days associated with those MEDs, and the TMED that was used to identify major event days each year.

Figure 5. Major event day metrics



The decrease in MEDs and associated restoration days in recent years is the result of fewer major storms and NIPSCO's vegetation management program. NIPSCO experienced a significant uptick in severe weather in 2019 that exceeded the system design criteria and resulted in eight MEDs. In addition, in 2019 NIPSCO experienced more severe weather days than in any of the past ten years.

Since 2017, NIPSCO has steadily increased funding for its vegetation management program that specifically focus on trimming more circuit miles on distribution and subtransmission circuits. The majority of the increase in spending has been on circuits that have the highest tree-related outages. NIPSCO continues to strive for a five-year cycle; however, the Company has found that a vast majority of the priority circuits have had a higher tree density than originally anticipated. For this reason, along with a high demand for tree contractor labor, NIPSCO has been hampered in achieving a five-year cycle at this time. Despite not realizing a five-year cycle, NIPSCO has seen an overall decrease in tree-related outages. From 2015 to 2018, tree-related outages per year

[1] The TMED calculation is based on IEEE Standard 1366-2012. It uses a utility's daily SAIDI values for the past five reporting years.

were consistently around 3,500 outages. In 2019, the number dropped to around 2,900 outages, a 17% improvement.

Utilities use three principal indices to measure service reliability.

SAIDI: represents the average outage duration of each electric customer served. In 2019, the average NIPSCO electric customer did not have electric service for 155 minutes due to reliability issues. NIPSCO's SAIDI has been below or slightly above the IEEE industry median for medium-sized utilities since 2014.

$$SAIDI = \frac{\sum customer\ outage\ minutes}{customers}$$

System Average Interruption Frequency Index (SAIFI): represents how many times per year the average customer experiences an interruption in electric supply. A customer must lose service for more than five minutes for the incident to be defined as an interruption. In 2019, the average NIPSCO electric customer experienced a power interruption 1.07 times. NIPSCO's SAIFI continues to be below (better than) the IEEE industry median for medium-sized utilities.

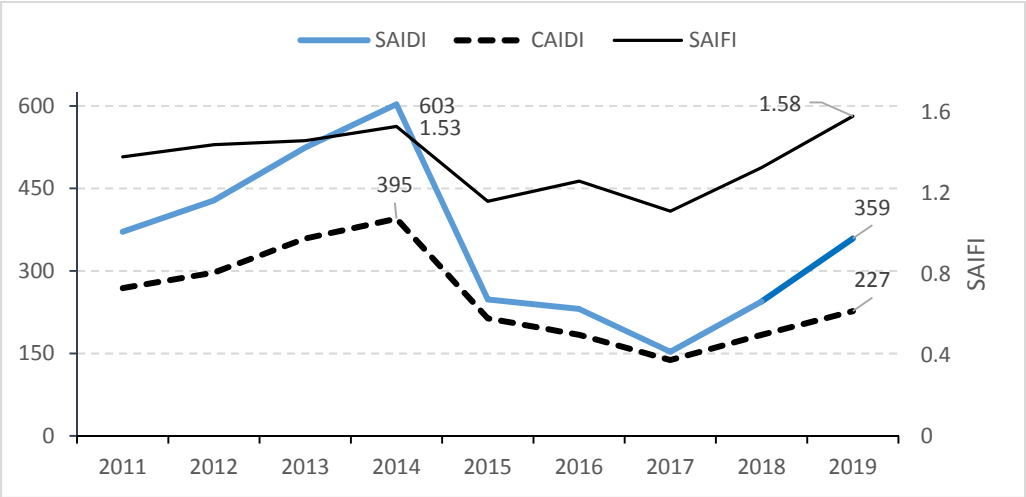
$$SAIFI = \frac{customer\ interruptions}{electric\ customers}$$

Customer Average Interruption Duration Index (CAIDI): represents the average length of outage for customers who experience an outage. CAIDI is therefore equal to SAIDI divided by SAIFI. In 2019, the average NIPSCO electric customer that experienced a power interruption had to wait 145 minutes before power was restored.

$$CAIDI = \frac{\sum customer\ outage\ minutes}{customer\ interruptions}$$

Figure 6 illustrates NIPSCO's three reliability indices using MED data.

Figure 6. Reliability indices (including MED data)



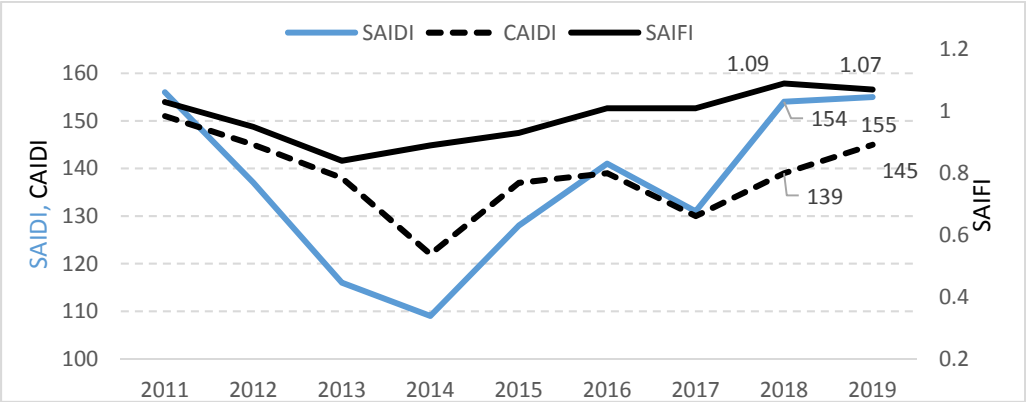
By industry standard, reliability indices are reported without MEDs, which are primarily storms or severe weather events more destructive than typical storm events. The data that is excluded (called MED data) is identified by using TMED. If a utility's daily SAIDI exceeds the TMED, the outage data on that date will be excluded from the utility's non-MED reliability indices. However, including MEDs in the reliability metrics provides a comprehensive view of the overall customer experience during outage events.

Considering the metrics from an all-inclusive perspective (*i.e.*, including MEDs) in the analysis, NIPSCO has demonstrated significant long-term improvement from a high in 2014. As depicted in Figure 6 above, when MEDs are included, NIPSCO achieved a 40% and 43% reduction in SAIDI and CAIDI, respectively.

The recent negative trend illustrated Figure 6 above and Figure 7 below, which excludes MED data, is primarily due to equipment failure, and reduced system resiliency from planned outage work. In addition, although improvement has been made in vegetation management, vegetation-related outages are a challenge. NIPSCO continues to invest capital in its electric system to improve reliability, including the replacement of over 2,000 wood poles and 33 miles of underground distribution cable in 2019. NIPSCO also investigates all outages impacting more than 1,000 customers and utilizes these lessons learned to improve construction standards, material selection, and system configuration.

Figure 7 illustrates NIPSCO's three reliability indices excluding MED data.

Figure 7. Reliability indices (excluding MED data)



In 2019, the average NIPSCO electric customer did not have electric service for 155 minutes, which is only one minute more than 2018, but experienced a slight decrease in outage frequency from 2018 levels. NIPSCO's SAIFI performance has been below (better than) the IEEE industry median for medium-sized utilities for the past 10 years. In 2019, the average NIPSCO electric customer that experienced a power interruption waited 145 minutes for power restoration, a slight increase from 2018.

The execution of extensive planned outage work to replace aging infrastructure through NIPSCO's Transmission, Distribution, and Storage System Improvement Charge plan, affected approximately 100,000 more customers from abnormal system configuration. To reduce this and to improve system redundancy during construction projects, NIPSCO has implemented a policy to include contingency plans for high-risk circuits/projects that contains alternate switching plans, returning circuits to system normal daily, and deploying mobile substations to improve system resiliency and reduce customer impact.

Power Generation

This report presents NIPSCO's generation productivity metrics by large generator type: coal and combined cycle natural gas. NIPSCO's coal units include those at the R.M. Schahfer Generating Station (Schahfer), Michigan City Generating Station (Michigan City), and Bailly Generating Station (Bailly), and the coal metrics shown are weighted by unit capacity. Bailly Units 7 and 8 were retired on May 31, 2018. Bailly is included in the generation productivity numbers through 2018, but is excluded beginning in 2019. Sugar Creek Generating Station (Sugar Creek) is the Company's combined cycle gas turbine plant. The three combustion turbines are peaking units that are rarely used.

Figure 8. Generation portfolio (MW)

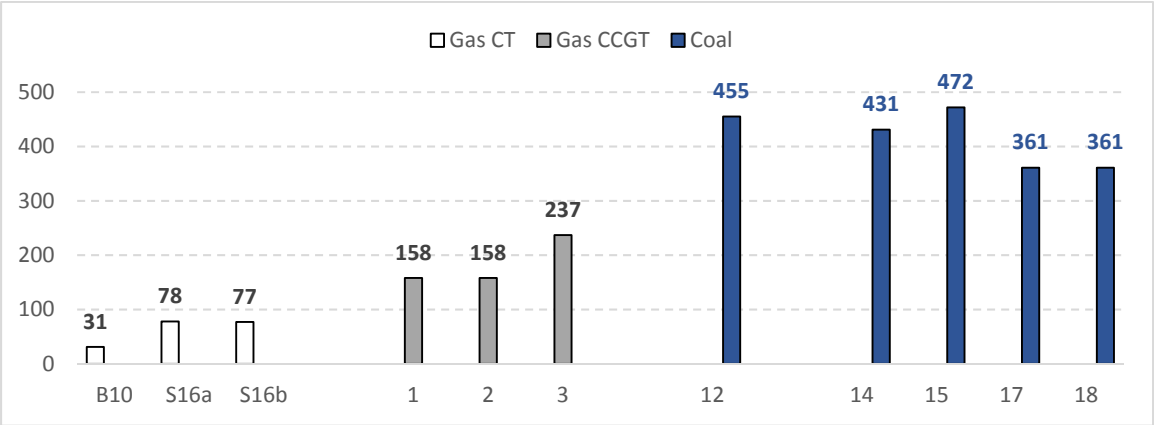
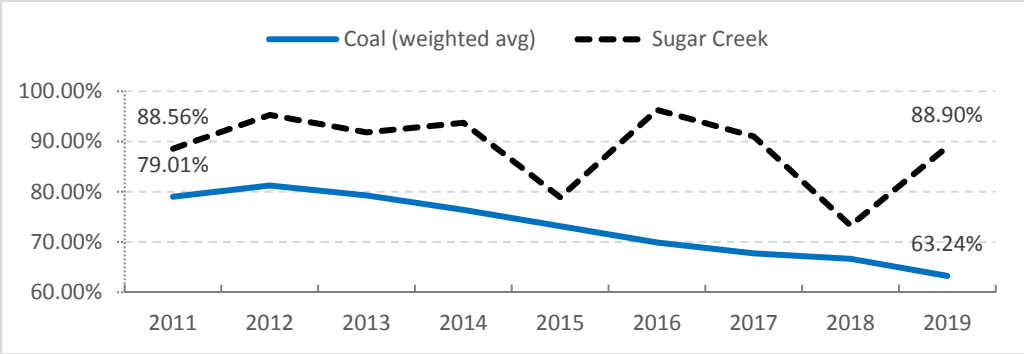


Figure 9 illustrates the *equivalent availability factors* (EAF) of NIPSCO's units.[2] This metric represents the percentage of time a unit was available to generate power. The "equivalent" part of the definition accounts for times in which the unit was derated, meaning it could generate power but not up to 100% of its potential.

Figure 9. Equivalent availability factor



Although Bailly was retired in the middle of the year, the 2018 numbers above include it for the entire year. When Bailly is removed, the EAF for the coal units is 71.62%. The EAF for 2019 does not include Bailly. In 2019, Units 12, 14, and 15 had both planned and forced outages, contributing to the lower number from previous years.

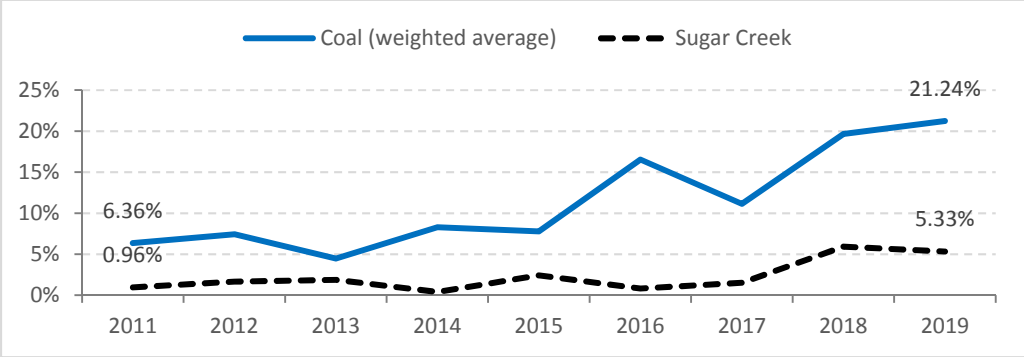
A unit's *equivalent forced outage rate* (EFOR) represents the percentage of time (in hours) the unit was unable to generate power for reasons other than planned maintenance.

[2] EAF = [(Available Hours – Equiv. Planned Derate Hours – Equiv. Unplanned Derate Hours) / Period Hours] × 100%

$$EFOR = \frac{FO + EFD}{FO + S + EFDRS} \times 100\%$$

These reasons include forced outages (FO) or equivalent forced derates (EFD), which occur if a unit is unable to produce 100% of its typical capacity. The denominator in the equation is the sum of forced outage hours, service hours, and equivalent forced derates when the unit is in reserve shutdown. Figure 10 illustrates NIPSCO's EFOR during the period.

Figure 10. EFOR

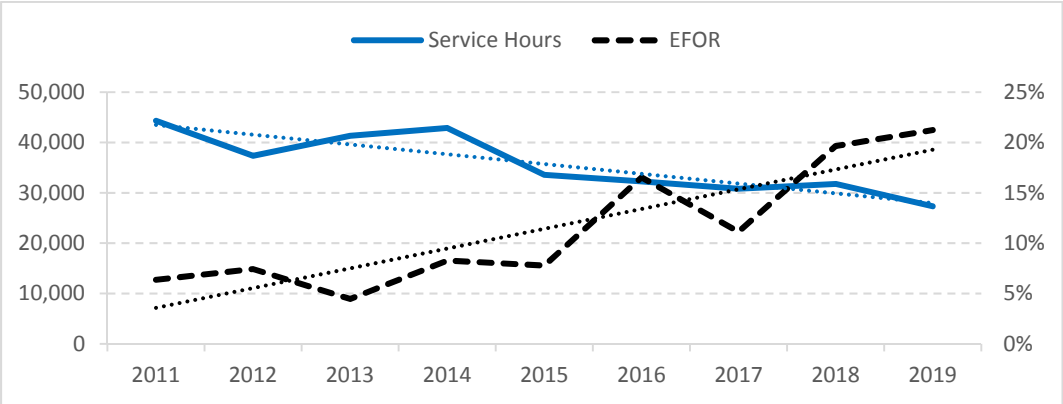


Although Bailly was retired in the middle of the year, the 2018 numbers above include it for the entire year. When Bailly is removed, the EFOR for the coal units is 16.87%. The EFOR for 2019 does not include Bailly.

NIPSCO's coal EFOR has been significantly affected by the changing power markets, which has economically dispatched coal units less frequently. When coal units are selected less often to generate power, the units must be started and stopped more often. This infrequent operation imposes high thermal stresses on a unit leading to an increase in forced and maintenance outage hours or lower availability. It also resulted in more unit reserve hours (fewer service hours) in 2019 than 2018.

Figure 11 illustrates the relationship between the total service hours of NIPSCO's coal generation and the EFOR of those units.

Figure 11. Coal generation

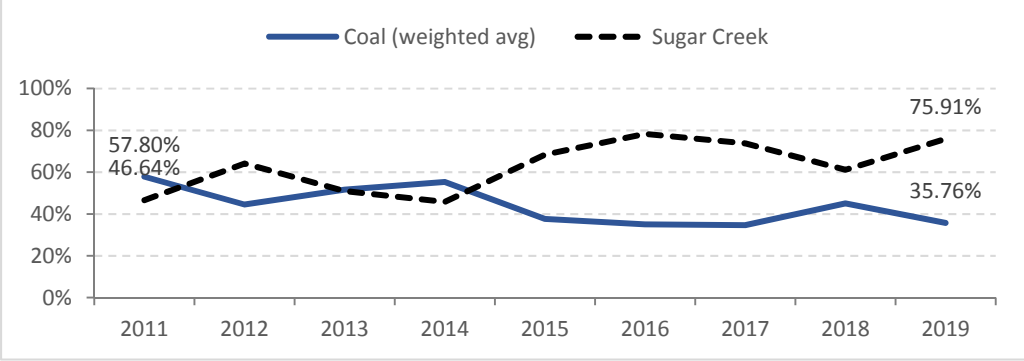


In 2019, the coal service hours were slightly lower than 2018 because of economics, as the coal-fired units were not dispatched as often under Midcontinent Independent System Operator, Inc.'s (MISO) security-constrained economic dispatching practices. The lower service hours directly impacts EFOR as explained above.

Figure 12 illustrates the *net capacity factor* (NCF) of NIPSCO's units. This metric represents the percentage of a unit's full capacity that it is allowed to produce on average during the period.

Net capacity factor is a function of a unit's availability and its variable operating costs. A unit that has frequent forced or planned outages, or high operating costs compared to other generating units, will have a lower capacity factor. A unit's NCF is affected by the amount of time it is available to run but has not been selected due to economics. A unit that is always available to generate and has competitive operating costs will have a higher capacity factor. This largely explains why NIPSCO's gas-fired units at Sugar Creek have a much higher NCF than its coal-fired units.

Figure 12. Net capacity factor[3]



[3] Generating units continue to consume a small amount of power even when they are not generating energy. This auxiliary power is subtracted from a unit's generation total and decreases the unit's NCF.

SERVICE

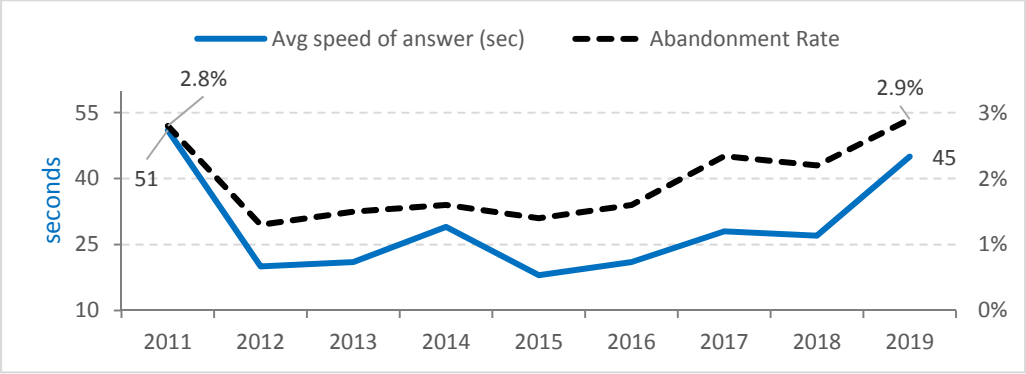
Customer Service

NIPSCO's highest priority is the delivery of safe, reliable service for customers. NIPSCO values its ability to quickly respond to the needs of its customers in the communities it serves across northern Indiana. The Company regularly benchmarks and measures the success of its customer service efforts in order to continually improve on processes and scores.

The *average speed of answer* metric represents the average number of seconds a caller waits before his or her call is answered by a Customer Service Representative, exclusive of the time a caller is navigating through the interactive voice response phone system.

The *abandonment rate* represents the percentage of telephone calls made to NIPSCO that are abandoned by the customer before speaking with a Customer Service Representative. The call center telephone system informs customers of their estimated wait time and gives them the option to receive a "virtual callback," in which the Virtual Hold technology auto dials the customer, in the order that the customer called, when a Customer Service Representative is available for the next caller. The metrics shown in Figure 13 are both indirectly related to the two metrics discussed below. The slight uptick in both metrics increased emphasis on staff training and new payment options for customers, including making a payment by telephone in lieu of disconnection while the crew is at the home to perform the disconnection. These new payment options provide benefits for customers, but take longer to process.

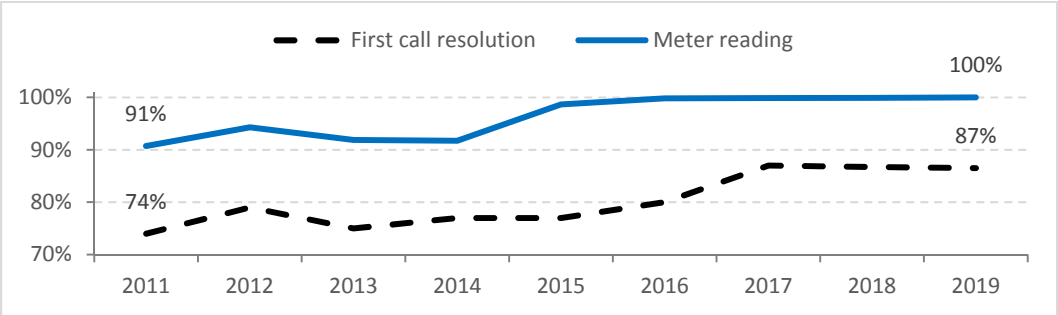
Figure 13. Call center operations



The *first call resolution* metric is measured by an outside vendor and represents how often NIPSCO is able to meet a customer's needs during the first telephone call. Customers highly value the ability of NIPSCO to resolve their issues quickly.

The *meter reading metric* represents the percentage of NIPSCO's residential and commercial electric meters that the Company accurately reads each month. The rollout of the Company's automated meter reader program in 2015 and 2016 accounts for the significant improvements in that period.

Figure 14. Employee efficiency



Customer Satisfaction

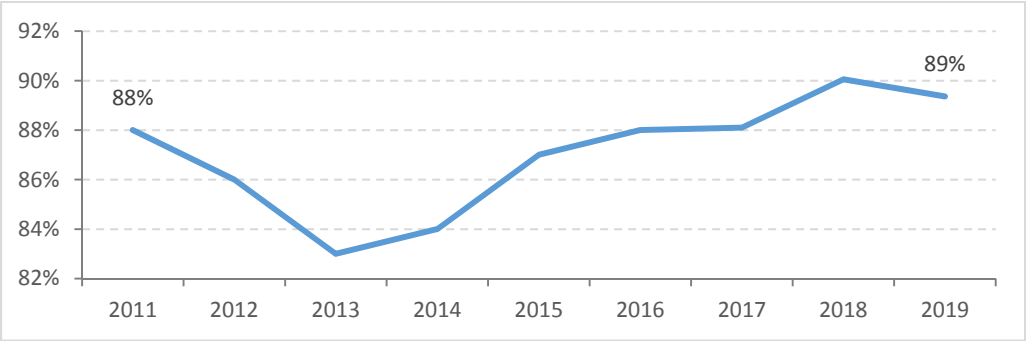
NIPSCO engages a third party to measure how well the Company interacts with its customers. The *customer satisfaction (CSAT) score* reflects the average customer's experience when the customer interacts with (1) a Customer Service Representative on the telephone; (2) the interactive voice response telephone system; (3) an employee on the customer's property; or (4) NIPSCO's self-service website.

Prior to 2015, the CSAT score primarily reflected customers' interactions with NIPSCO's call center, and customers were only asked a single question. The Company modified its satisfaction survey that year to better measure its performance in discreet channels, and weighted each channel's score according to the number of surveys completed for that channel. NIPSCO has found that measuring customer satisfaction in different channels better identifies successful practices and opportunities for improvement.

In 2017, NIPSCO hired a new vendor and made three significant changes to determining the CSAT score. First, customers were allowed to complete online surveys. All surveys had previously been conducted over the telephone. Second, NIPSCO began weighting each communication channel equally in the CSAT score calculation. Third, the Company switched from quantitative responses (1-10) to qualitative responses (such as "I am somewhat satisfied"). For these reasons, NIPSCO uses the 2017 score as the new benchmark for this metric.

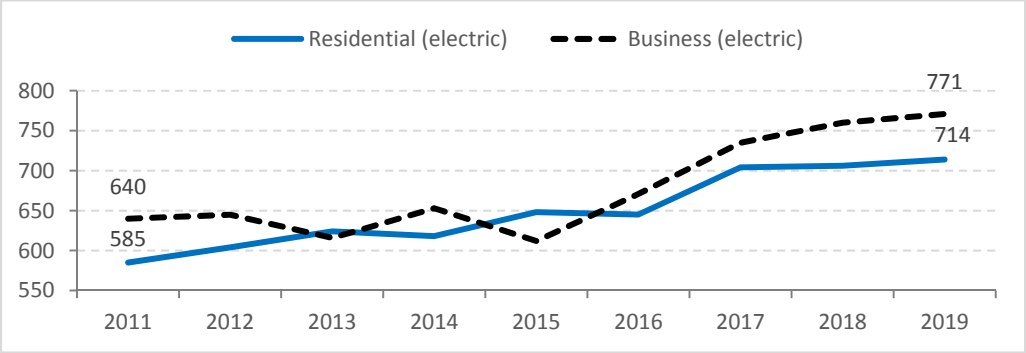
NIPSCO incorporated the residential gas and electric J.D. Power scores into its corporate incentive plan calculation in 2016 as part of its commitment to customer service. The Company incorporated the CSAT score into that calculation the following year.

Figure 15. Customer satisfaction score



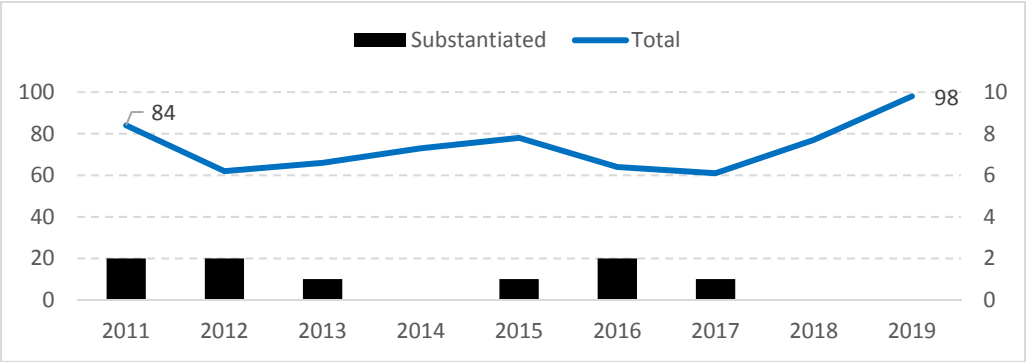
The *J.D. Power Electric Utility Customer Satisfaction* studies examine residential and business customer satisfaction across six factors – power quality and reliability, price, billing and payment, communications, corporate citizenship, and customer service. In 2019, NIPSCO achieved its highest ratings in both studies. This trend is continuing in 2020. First quarter results for the residential customer satisfaction show that NIPSCO now ranks third in the Midwest for medium sized utilities with a rating of 769 compared to an industry average of 748.

Figure 16. J.D. Power scores



Utility customers in Indiana may file a complaint with the Commission if they feel aggrieved. The Commission's Consumer Affairs Division investigates each complaint and determines whether the complaint is substantiated. Figure 17 illustrates the number of electric complaints filed with the Commission against NIPSCO and the number of complaints that uncovered a violation. In November 2019, residents of Miller Beach, Indiana filed 26 complaints with the IURC regarding electric power outages, which accounts for the increase in filed complaints in 2019. NIPSCO met with the Mayor of Gary, Indiana to discuss its plans to address the Miller Beach area. NIPSCO also held a community discussion with the residents and communicated directly with the main analyst with the IURC. Ultimately, all 26 complaints were ruled unsubstantiated. For the second year in a row, NIPSCO did not have any substantiated customer complaints.

Figure 17. IURC electric complaints



INVESTMENT & SPENDING

This section analyzes NIPSCO's operations and maintenance expense (O&M). The data is the same as the data included in NIPSCO's Federal Energy Regulatory Commission (FERC) Form 1.

The Electric O&M Expense section of the FERC Form 1 is divided into eight parts. The Part 1 covers power production, which is divided into steam, nuclear, hydro, and other (gas). Parts 2-4 cover power delivery functions: transmission, regional market, and distribution. Parts 5-7 cover customer service, and Part 8 covers corporate administration.

In this report, megawatt hour (MWh) represents total sales, including sales for resale, except for Figure 18, which also expresses non-fuel production O&M expense as a function of MWh generated by the utility.

The "non-fuel" numerators exclude Accounts 501 (steam fuel), 547 (other generation fuel), and 555 (purchased power). These accounts can be found on pages 320 and 321 of the FERC Form 1.

Total O&M

Figure 18. O&M per MWh[4]

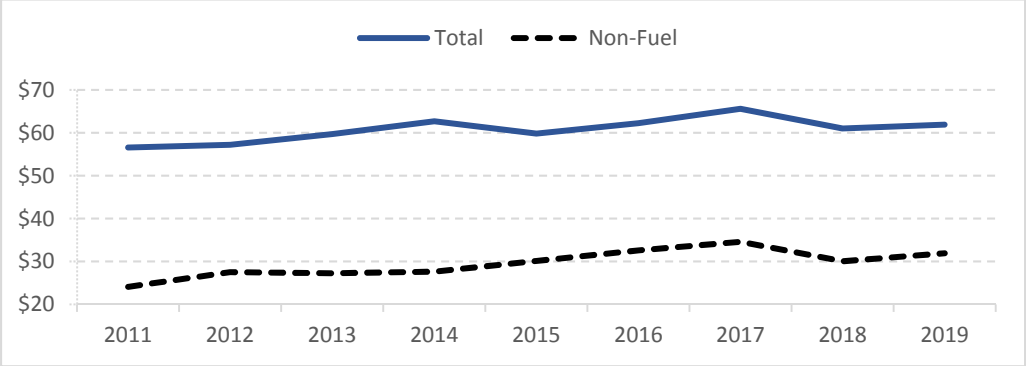
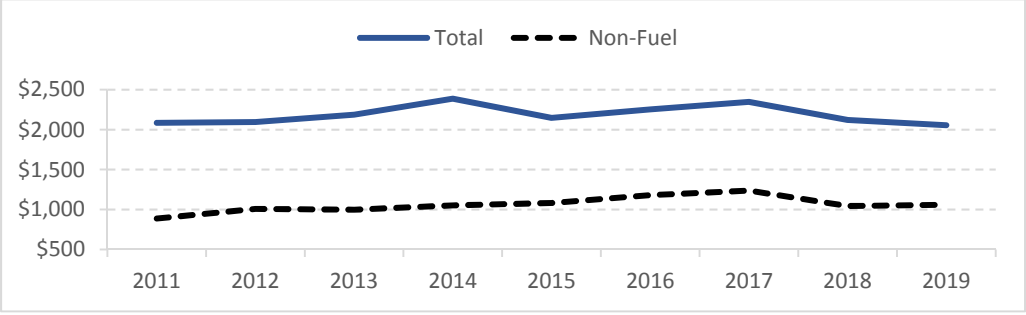


Figure 19. O&M per retail customer[5]



[4] Page 323, line 198 / Page 301, line 10(d).
[5] Page 323, line 198 / Page 301, line 10 (f).

O&M Components

Figure 20 illustrates NIPSCO's non-fuel production O&M expense.

Figure 20. Non-fuel production O&M expense[6]

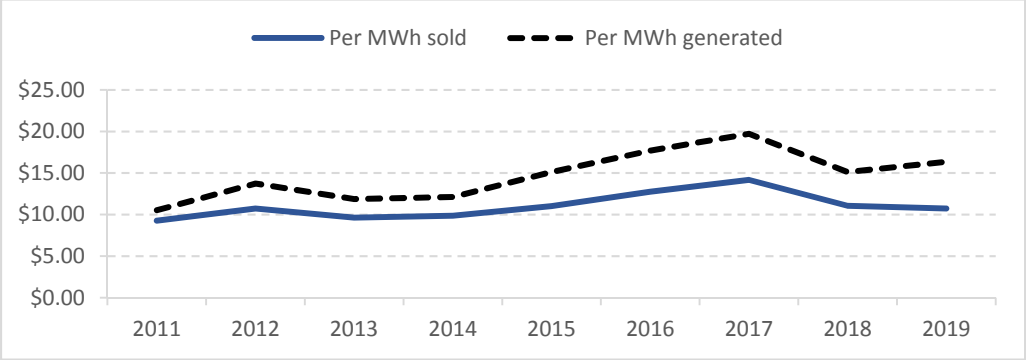
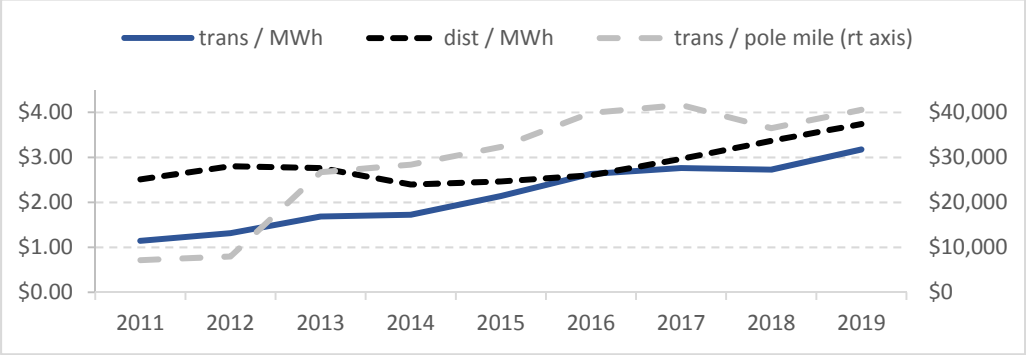


Figure 21 illustrates NIPSCO's transmission and distribution expenses as a function of energy sales. It also shows transmission expenses as a function of line miles. In 2013, NIPSCO reclassified its 69 kV circuit miles from transmission to distribution in accordance with FERC's seven-factor test.

Figure 21. Transmission and distribution O&M expense[7]



The principal driver of transmission expense during the period has been *Account 561.8, Reliability, Planning, and Standards Development Services*. This account reflects the costs of three regional transmission expansion (TEP) project types that MISO has billed to NIPSCO through Schedule 26. The Commission authorized NIPSCO to begin recovering these costs through the utility's Regional Transmission Organization tracker (Rider 871) in 2012.

The largest component of distribution expense each year is *Account 593, Maintenance of Overhead Lines*, which has averaged 50% of the total expenses in this category since 2011. Over this period, the annual growth in this account has averaged 4.5%. The reliability section in this report discusses

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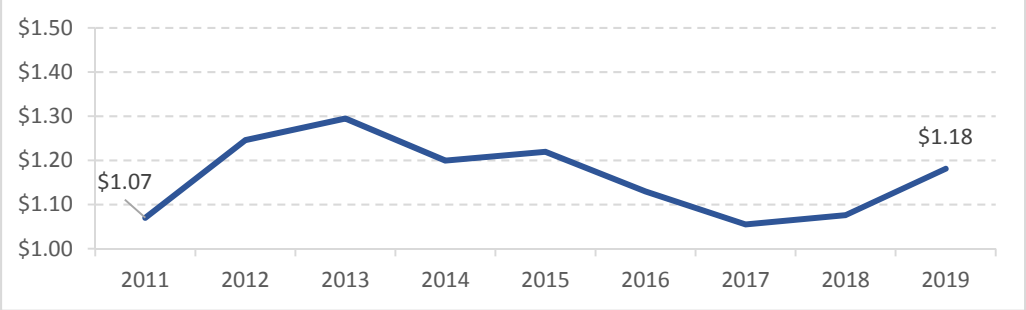
6 Page 321, line 80– lines 5, 25, 63, and 76 / Page 301, line 12(d), per MWh generated uses Page 401a. line 9.

7 Transmission (Page 321 line 112); distribution (Page 322, line 156) / MWh (Page 301, line 12(d); pole mile (Page 422, line 36).

how NIPSCO's investment in vegetation management the past few years has positively affected its reliability indices.

Customer expense accounts in the FERC Form 1 are organized into three parts: customer accounts, customer service and information, and sales. Figure 22 illustrates the sum of these accounts divided by total sales. In 2019, NIPSCO had decreased O&M expense compared to 2018, but also had decreased volumes, causing an uptick in the expense per MWh metric.

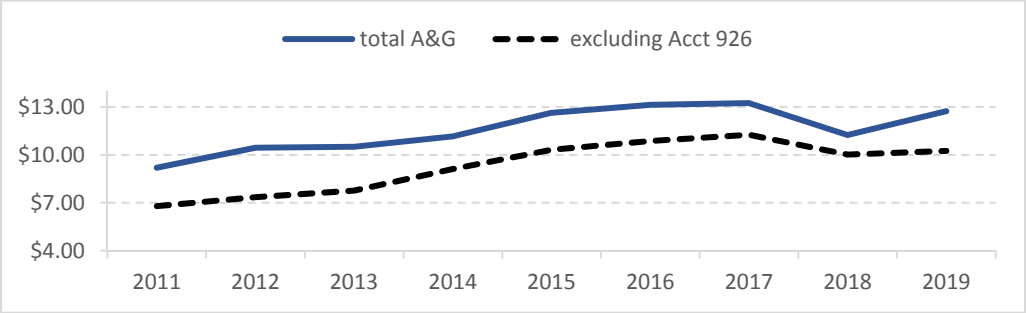
Figure 22. Customer O&M expense per MWh[8]



Administrative and general (A&G) expenses is the final O&M component shown in the FERC Form 1. This part includes accounts such as A&G salaries, office expenses, outside services employed, and employee benefits. These expenses are primarily fixed, meaning they do not rise and fall in the short-run with sales.

Figures 23 and 24 show A&G expenses as a function of total sales and retail customers. The figures also represent the metrics without *Account 926, Employee Pensions and Benefits*. This account is largely driven by interest rates and investment returns, two functions significantly outside of a utility's control. When Account 926 is removed, overall A&G expense decreased in 2019.

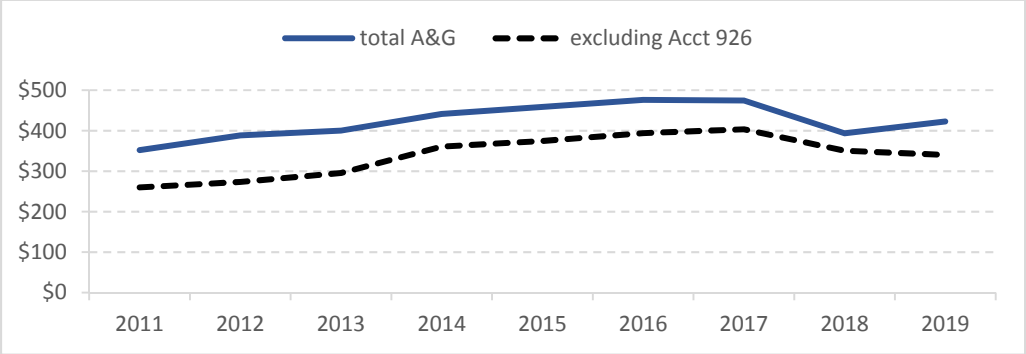
Figure 23. A&G O&M expense per MWh[9]



8 Page 323, line 164 + line 171 + line 178 / Page 301, line 12(d).

9 Page 323, line 197 / Page 301, line 12(d); Acct 926 is Employee Pensions and Benefits expense (Page 323, line 187).

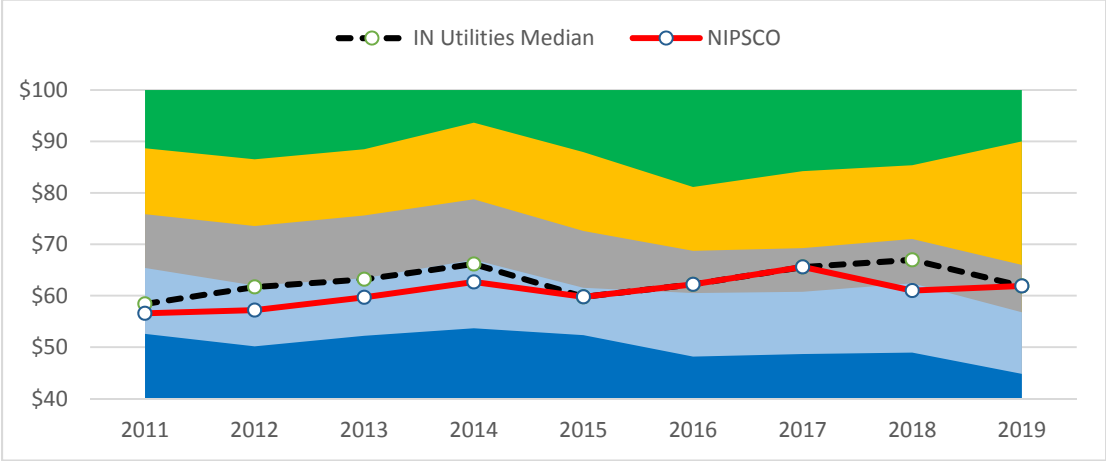
Figure 24. A&G O&M expense per retail customer[10]



Benchmarking Analysis

This section illustrates the respective metrics of NIPSCO and the median Indiana electric investor owned utilities against nationally comparable data. The data of the 20% of U.S. utilities with the lowest metrics (the first quintile) is represented within the dark blue section at the bottom of each graph. Each colored area above the first quintile represents a successive quintile.

Figure 25. O&M expense per retail MWh



[10] Page 323, line 197 / Page 301, line 12(f); Acct 926 is Employee Pensions and Benefits expense (Page 323, line 187).

Figure 26. Non-fuel O&M expense per retail MWh

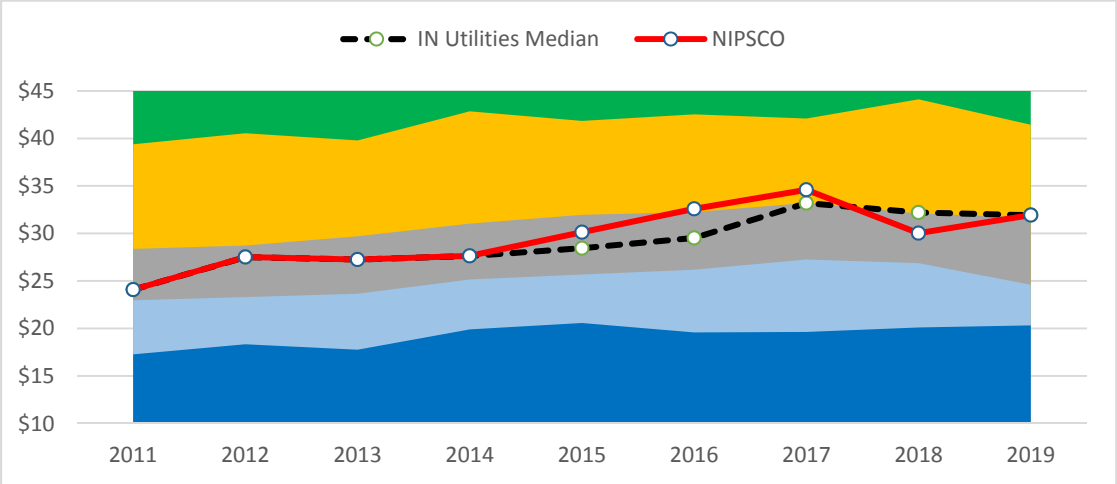
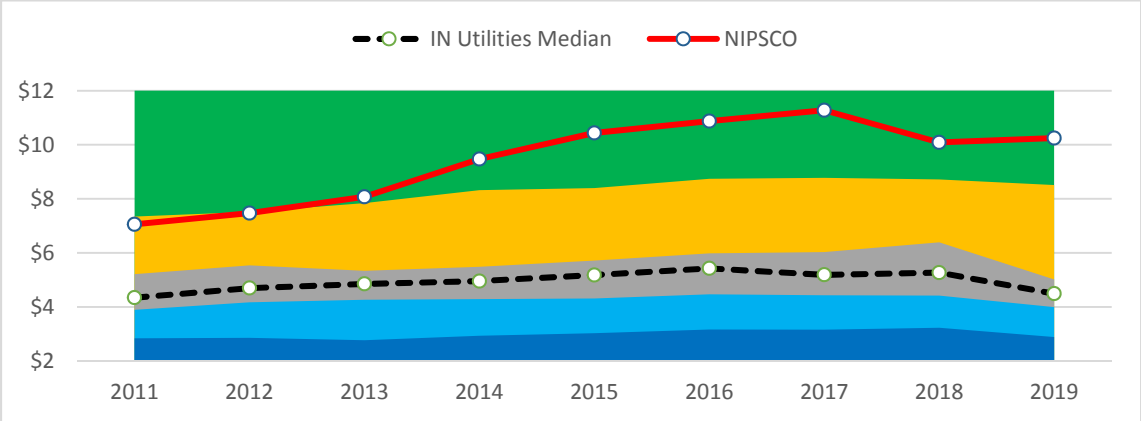


Figure 27. A&G O&M expense (net of Acct 926) per retail MWh

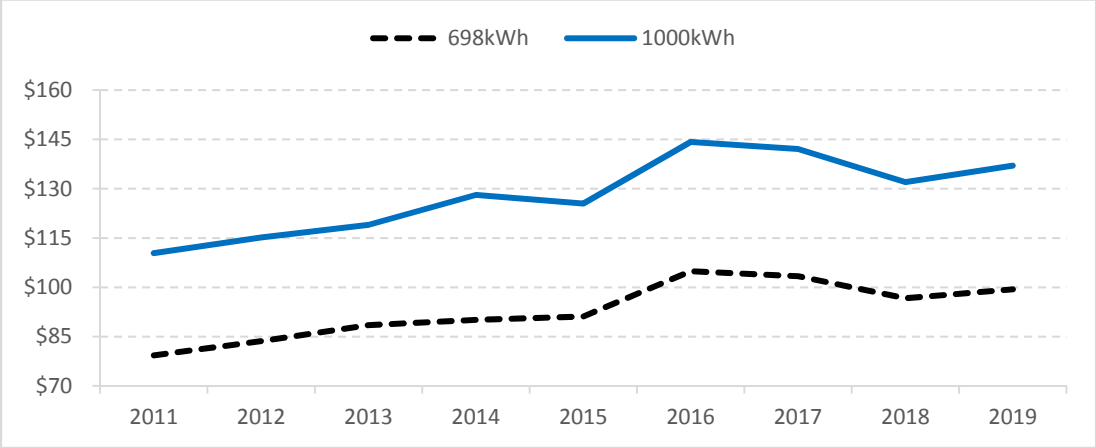


AFFORDABILITY

Customer Bills

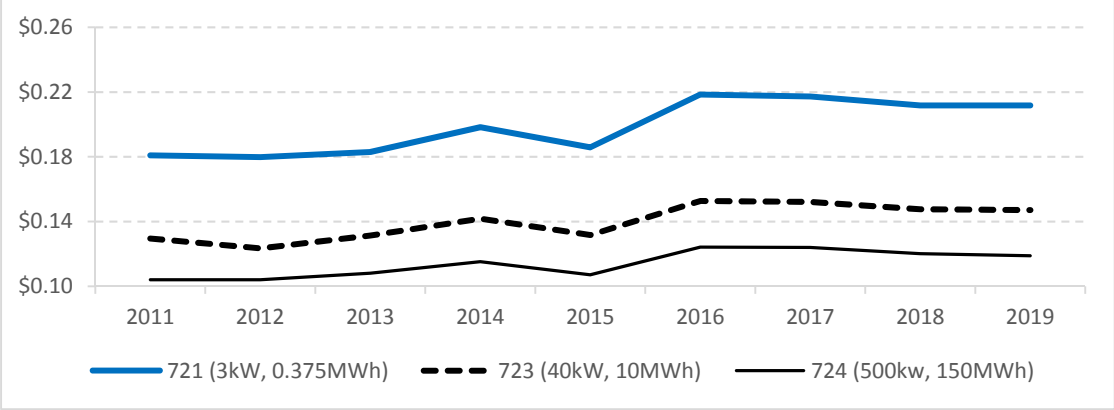
NIPSCO's electric base rates in 2019 went into effect on October 1, 2016. NIPSCO's customers experienced a decrease in bills in 2018 primarily driven by the Tax Cuts and Jobs Act of 2017. The average monthly usage of NIPSCO's residential customers during the test year of the Company's rate case establishing these rates was 698 kWh. NIPSCO had new electric base rates go into effect in 2020, however they are not reflected in this report.

Figure 28. Residential bills[11]



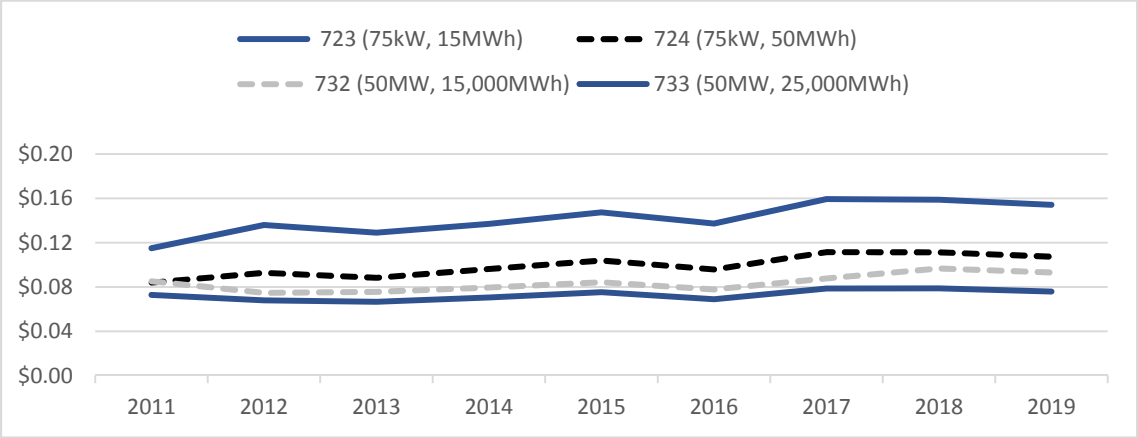
The figures below depict seven of the 15 demand and usage combinations that the Edison Electric Institute includes in its *Typical Bills and Average Rates Report*, which is published each winter. The average rates for all 15 combinations are included in the appendix to this report.

Figure 29. Commercial bills



[11] The IURC calculates each utility's electric bill on July 1 each year and reports this information at https://www.in.gov/iurc/2761.htm. For consistency, the 698 kWh number reflects July 1, 2019 data as well.

Figure 30. Industrial bills



Service Disconnections

NIPSCO mails a notice of disconnection to a customer 12 days after the customer's bill is due. NIPSCO continues to work with customers with arrears by initiating telephone calls to facilitate payment arrangements. As a result, fewer orders for disconnection are sent to the field. In addition, in June 2018, NIPSCO launched a new program that allows for customers to make payments over the telephone while the technician is on-site to complete the disconnection, thereby providing a final opportunity to avoid disconnection. These efforts have led to significant reductions in disconnections for non-payment in 2018 and 2019, as compared to earlier years.

Figure 31. Residential service disconnections

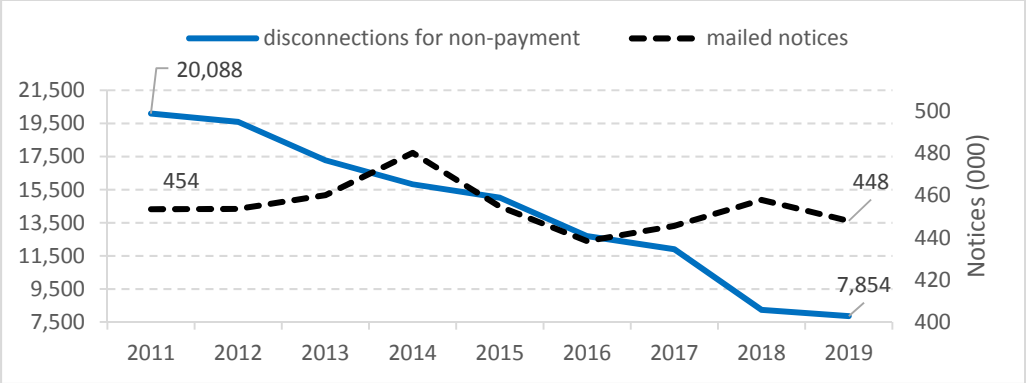
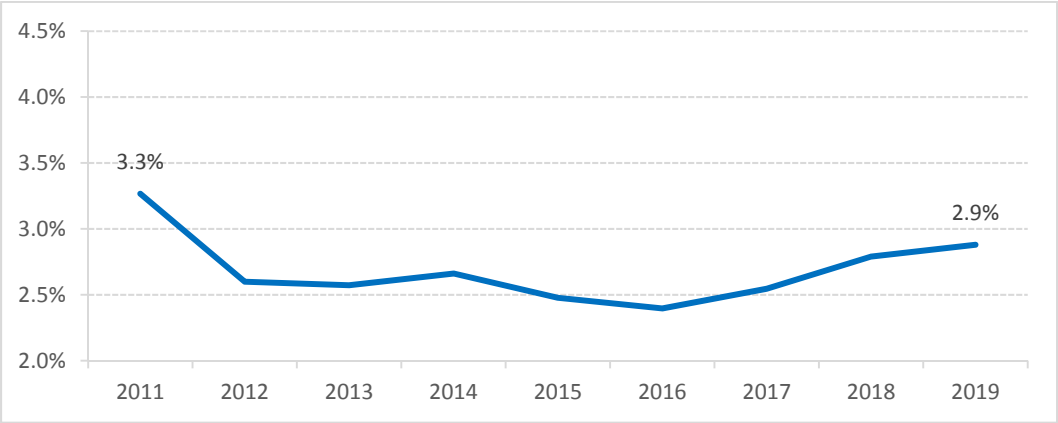


Figure 32. Average accounts in arrears at least 60 days

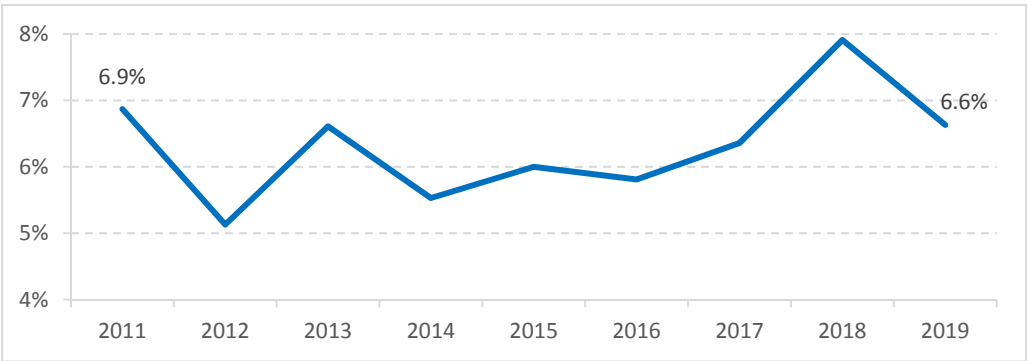


In 2018, the Indiana Housing and Community Development Authority moved to a new system for energy assistance program transmittals for the 2017-2018 Low Income Home Energy Assistance Program (LIHEAP) season resulting in a situation where NIPSCO was not notified of all customers who qualified for LIHEAP. As a result, shut off orders were cancelled for all residential customers in January, February, and the first half of March. This was a proactive approach to ensure customers who had been advised they would receive assistance were not disconnected. In 2019, NIPSCO returned to the typical winter moratorium only for LIHEAP eligible customers.

Staffing

NIPSCO's employee turnover ratio is calculated using the average number of employees during the year. The uptick in 2018 was primarily driven due to retirements.

Figure 33. Employee turnover



NIPSCO is committed to attracting and retaining a diverse and qualified workforce. Inclusion and diversity, not only of race or gender, but of thought, life experience, culture, ability, generation, sexual orientation, and other characteristics, is an ongoing, strategic initiative that is part of the Company's operating plan. NIPSCO sponsors and participates in job fairs which include the American Association of Blacks in Energy National Conference, the United States Hispanic Leadership Institute, Indiana Black Expo, and the Times of Northwest Indiana. NIPSCO posts to

well over 480 job sites, including military networks, University/College sites, Disability sites, Federal Government, State Government, Metro Areas, Diversity and others such as those that cater to engineers. NIPSCO engages in community outreach to over 45 organizations and also uses 39 specific sites in CareerBuilder to engage with diverse groups. Retention of employees is also a key component of NIPSCO's operating plan. New Employee Orientation begins with a formal process on the first day of employment and then job-specific training is conducted. NIPSCO has also developed numerous Affinity Groups (Employee Resource Groups) to promote networking and support.

CONCLUSION

NIPSCO continues to focus on safety; reliability; customer service; investment and spending; and affordability. In 2019, NIPSCO saw improvements in several areas, and laid plans for additional improvements in other areas. The common theme in all of these areas is NIPSCO's commitment to its customers. Building on the SMS will continue to improve safety, which benefits employees, contractors, customers, and communities. NIPSCO will strive to continue to improve its reliability metrics and maintain its focus on vegetation management. In addition, the Company recognizes the importance of providing excellent customer service and maintaining affordability, through rates, investments, and spending. Key to achieving all of these goals is continued employee engagement. NIPSCO appreciates the opportunity to review these metrics with its stakeholders as it provides valuable input into the process of continued improvement.

2019 Performance Metric Report

	Fig.	2011	2012	2013	2014	2015	2016	2017	2018	2019
Safety										
Preventable vehicle crash rate	1	5.10	3.26	2.28	2.14	2.43	1.76	1.84	1.97	2.85
OSHA recordable incident rate	2	2.61	2.70	1.57	1.41	2.20	2.23	1.29	2.23	2.70
DART		1.01	1.60	1.08	0.97	1.18	1.37	0.61	1.61	1.95
OSHA rate NIPSCO w/BSA	3	2.61	1.83	1.5	1.26	1.23	1.2	0.75	1.14	1.33
DART - NIPSCO with BSA		1.1	1.04	0.93	0.84	0.65	0.61	0.33	0.68	0.88
Underground damages	4	3.48	4.50	3.73	3.11	3.00	2.56	2.48	2.05	1.97
Reliability										
Major event days	5	7	5	6	7	3	4	2	5	8
Assoc. restor. days		15	12	8	11	5	6	2	7	14
TMED (minutes)		11.8	11.5	9.4	8.2	9.5	8.7	8.2	7.9	7.8
SAIDI (MED)	6/7	371	428	524	603	248	231	153	244	359
(non-MED)		156	137	116	109	128	141	131	151	155
SAIFI (MED)		1.38	1.44	1.46	1.53	1.16	1.26	1.11	1.33	1.58
(non-MED)		1.03	0.95	0.84	0.89	0.93	1.01	1.01	1.09	1.07
CAIDI (MED)		269	297	359	395	214	184	138	184	227
(non-MED)		151	145	138	122	137	139	130	139	145
Generating unit capacity	8	(shown in figure)								
EAF	9									
12 Michigan City		89.88%	81.20%	64.72%	86.10%	55.36%	53.63%	45.38%	63.45%	49.30%
7 Bailly		70.81%	82.09%	92.36%	78.74%	70.13%	75.29%	63.93%	42.23%	Retired
8 Bailly		74.38%	75.95%	84.12%	69.15%	67.23%	57.44%	66.03%	0.00%	
14 Schahfer		69.14%	76.55%	74.21%	77.99%	69.18%	74.89%	87.62%	61.41%	51.44%
15 Schahfer		75.66%	81.72%	73.63%	66.22%	87.36%	80.75%	55.15%	80.28%	62.94%
17 Schahfer		91.84%	74.69%	86.52%	81.48%	74.99%	89.12%	67.84%	87.24%	79.62%
18 Schahfer		75.99%	96.97%	94.11%	75.52%	87.18%	60.40%	92.60%	67.51%	79.45%
Coal (weighted avg)		*79.01%*	*81.22%*	*79.25%*	*76.40%*	*73.15%*	*69.91%*	*67.74%*	*66.64%*	*63.24%*
Sugar Creek		88.56%	95.27%	91.81%	93.71%	78.90%	96.28%	91.00%	73.29%	88.90%
EFOR	10									
12 Michigan City		5.14%	1.17%	6.59%	1.09%	0.47%	16.25%	6.68%	24.36%	15.05%
7 Bailly		7.47%	1.88%	3.95%	3.45%	20.69%	8.32%	15.77%	56.01%	Retired
8 Bailly		7.48%	7.81%	4.92%	8.78%	13.20%	22.01%	17.00%	100.00%	
14 Schahfer		3.20%	19.26%	10.52%	19.02%	32.89%	51.25%	17.94%	20.80%	39.83%
15 Schahfer		9.61%	13.12%	1.76%	11.03%	5.62%	15.46%	17.29%	19.08%	23.28%
17 Schahfer		7.50%	7.01%	5.20%	10.29%	0.66%	6.16%	12.75%	6.15%	10.90%
18 Schahfer		4.11%	1.55%	0.19%	4.89%	2.69%	6.57%	2.60%	11.19%	15.21%
Coal (weighted average)		*6.36%*	*7.43%*	*4.46%*	*8.28%*	*7.78%*	*16.54%*	*11.14%*	*19.66%*	*21.24%*
Sugar Creek		0.96%	1.66%	1.89%	0.41%	2.43%	0.82%	1.54%	5.93%	5.33%
Net capacity factor	12									
12 Michigan City		72.10%	56.82%	49.25%	66.67%	40.17%	41.30%	31.41%	51.19%	26.12%
7 Bailly		56.95%	44.48%	52.61%	53.50%	48.89%	53.58%	47.61%	36.58%	Retired
8 Bailly		60.38%	41.73%	54.68%	50.35%	26.98%	36.44%	31.33%	0.00%	
14 Schahfer		52.58%	27.12%	40.83%	40.20%	13.21%	12.21%	17.00%	38.98%	32.20%
15 Schahfer		59.41%	55.92%	54.02%	47.28%	45.04%	24.13%	20.25%	51.59%	37.62%
17 Schahfer		47.18%	30.42%	41.62%	65.64%	38.81%	49.30%	39.76%	55.00%	39.79%
18 Schahfer		52.06%	51.13%	71.35%	63.88%	56.69%	44.11%	70.27%	44.64%	46.06%
Coal (weighted avg)		*57.80%*	*44.54%*	*51.63%*	*55.30%*	*37.64%*	*35.02%*	*34.62%*	*45.05%*	*35.76%*
Sugar Creek		46.64%	64.18%	50.98%	45.81%	68.41%	78.33%	73.79%	61.15%	75.91%

	Fig.	2011	2012	2013	2014	2015	2016	2017	2018	2019
Customer Satisfaction										
Avg speed of answer (sec)	13	51	20	21	29	18	21	28	27	45
Abandonment rate		2.8%	1.3%	1.5%	1.6%	1.4%	1.6%	2.3%	2.2%	2.9%
First call resolution	14	74%	79%	75%	77%	77%	80%	87%	87%	87%
Meter reading		91%	94%	92%	92%	99%	100%	100%	100%	100%
Customer survey	15	88%	86%	83%	84%	87%	88%	88%	90%	89%
J.D. Power scores										
Residential (electric)	16	585	604	624	618	648	645	704	706	714
Business (electric)		640	645	616	653	612	671	735	760	771
Complaints to regulator										
Substantiated	17	2	2	1	0	1	2	1	0	0
Total		84	62	66	73	78	64	61	77	98
Unsubstatiated		82	60	65	73	77	62	60	77	98
O&M Expenses										
O&M per MWh (total)	18	$56.57	$57.19	$59.70	$62.67	$59.79	$62.21	$65.59	$61.00	$61.89
(non-fuel)		$24.09	$27.52	$27.26	$27.63	$30.14	$32.59	$34.59	$30.04	$31.93
O&M per customer (total)	19	$2,084	$2,095	$2,186	$2,386	$2,146	$2,254	$2,346	$2,120	$2,055
(non-fuel)		$888	$1,008	$998	$1,052	$1,082	$1,181	$1,237	$1,044	$1,060
Non-fuel production O&M										
per MWh sold	20	$9.27	$10.73	$9.63	$9.85	$11.02	$12.74	$14.17	$11.06	$10.73
per MWH generated		$10.53	$13.74	$11.86	$12.11	$15.13	$17.71	$19.72	$15.11	$16.35
Transmission per MWh	21	$1.15	$1.31	$1.69	$1.73	$2.14	$2.63	$2.76	$2.73	$3.17
Transmission per pole mile		$7,161	$7,985	$26,699	$28,367	$32,333	$39,913	$41,638	$36,477	$40,567
Distribution expense per MWh		$2.51	$2.80	$2.76	$2.40	$2.47	$2.60	$2.97	$3.37	$3.74
Customer operations per MWh	22	$1.07	$1.25	$1.29	$1.20	$1.22	$1.13	$1.05	$1.08	$1.18
A&G per MWh	23	$9.20	$10.44	$10.50	$11.15	$12.63	$13.13	$13.24	$11.24	$12.72
excluding Acct. 926		$6.79	$7.36	$7.76	$9.12	$10.32	$10.86	$11.26	$10.01	$10.24
A&G per customer	24	$352	$388	$400	$441	$459	$476	$474	$393	$423
excluding Acct. 926		$260	$274	$296	$361	$375	$394	$403	$351	$340
Benchmarking										
O&M expense per retail MWh	25									
1st quintile		$53	$50	$52	$54	$52	$48	$49	$49	$45
2nd quintile		$65	$62	$63	$67	$62	$61	$61	$63	$57
3rd quintile		$76	$74	$76	$79	$73	$69	$69	$71	$66
4th quintile		$89	$87	$88	$94	$88	$81	$84	$86	$90
5th quintile		$100	$100	$100	$100	$100	$100	$100	$100	$100
Ind. IOU median		*$58*	*$62*	*$63*	*$66*	*$60*	*$62*	*$66*	*$67*	*$62*
NIPSCO		*$57*	*$57*	*$60*	*$63*	*$60*	*$62*	*$66*	*$61*	*$62*
O&M (net fuel) per retail MWh	26									
1st quintile		$17	$18	$18	$20	$21	$20	$20	$20	$20
2nd quintile		$23	$23	$24	$25	$26	$26	$27	$27	$25
3rd quintile		$28	$29	$30	$31	$32	$32	$33	$32	$32
4th quintile		$39	$41	$40	$43	$42	$43	$42	$44	$41
5th quintile		$45	$45	$45	$45	$45	$45	$45	$45	$45
Ind. IOU median		*$24*	*$28*	*$27*	*$28*	*$28*	*$30*	*$33*	*$32*	*$32*
NIPSCO		*$24*	*$28*	*$27*	*$28*	*$30*	*$33*	*$35*	*$30*	*$32*

	Fig.	2011	2012	2013	2014	2015	2016	2017	2018	2019
A&G (less Acct 926) per MWh	27									
1st quintile		$2.84	$2.85	$2.77	$2.93	$3.03	$3.16	$3.16	$3.21	$2.88
2nd quintile		$3.89	$4.17	$4.26	$4.29	$4.31	$4.47	$4.43	$4.39	$3.99
3rd quintile		$5.21	$5.54	$5.34	$5.48	$5.71	$5.98	$6.03	$6.34	$5.02
4th quintile		$7.34	$7.52	$7.84	$8.32	$8.40	$8.74	$8.78	$8.74	$8.51
5th quintile		$12.00	$12.00	$12.00	$12.00	$12.00	$12.00	$12.00	$12.00	$12.00
Ind. IOU median		*$4.34*	*$4.70*	*$4.85*	*$4.96*	*$5.18*	*$5.43*	*$5.19*	*$5.18*	*$4.49*
NIPSCO		*$7.05*	*$7.47*	*$8.07*	*$9.47*	*$10.44*	*$10.88*	*$11.28*	*$10.08*	*$10.25*
Affordability										
Residential rates (as of July 1)										
Bill (698kWh)	28	$79	$84	$89	$90	$91	$105	$103	$97	$99
Bill (1000kWh)		$110	$115	$119	$128	$125	$144	$142	$132	$137
Components ($/kWh, May 1 of *following* year, as of July 1 for 2019)										
base fuel								$0.0325	$0.0325	$0.0325
O&M expense								$0.0294	$0.0294	$0.0294
D&A expense								$0.0133	$0.0133	$0.0133
taxes								$0.0100	$0.0073	$0.0073
NOI and settlement adjust't								$0.0130	$0.0130	$0.0130
capital trackers								$0.0016	$0.0038	$0.0039
expense trackers								$0.0138	$0.0126	$0.0077
total								$0.1136	$0.1119	$0.1071
Variable charges (cents) (as of July 1 for 2019)										
811 energy							11.0433	11.0433	10.6764	10.6764
870 FAC							0.2625	0.0836	-0.3279	-0.1999
871 RTO							0.1664	0.1220	0.2138	0.1015
872 ECR							0.9330	0.4221	0.2963	0.2745
874 RA							0.3030	0.4388	0.4160	0.3651
883 DSM							0.3157	0.3770	0.2272	0.5053
887 FMC							-0.0011	-0.0019	0.0249	0.1325
888 TDSIC							0.0000	0.3204	0.3159	0.3813
Total variable charge							13.0228	12.8053	11.8426	12.2367
Customer charge ($)						$11.00	$14.00	$14.00	$14.00	$14.00
Commercial rates	29									
Rate *kW* *MWh* *LF%*										
721 3 0.375 17%		$0.181	$0.180	$0.183	$0.198	$0.186	$0.218	$0.217	$0.212	$0.210
12 1.5 17%		$0.141	$0.140	$0.143	$0.158	$0.146	$0.170	$0.169	$0.164	$0.162
723 40 10 34%		$0.130	$0.123	$0.131	$0.142	$0.132	$0.153	$0.152	$0.148	$0.147
40 14 48%		$0.115	$0.108	$0.116	$0.127	$0.117	$0.137	$0.136	$0.131	$0.131
724 500 150 41%		$0.104	$0.104	$0.108	$0.115	$0.107	$0.124	$0.124	$0.120	$0.119
500 180 49%		$0.097	$0.097	$0.101	$0.108	$0.100	$0.117	$0.116	$0.113	$0.111
Industrial rates	30									
Rate *kW* *MWh* *LF%*										
723 75 15 27%		$0.136	$0.129	$0.137	$0.147	$0.137	$0.159	$0.159	$0.154	$0.154
75 30 55%		$0.107	$0.100	$0.108	$0.118	$0.108	$0.128	$0.127	$0.123	$0.122
724 75 50 91%		$0.093	$0.088	$0.096	$0.104	$0.096	$0.111	$0.111	$0.107	$0.106
1,000 200 27%		$0.120	$0.120	$0.125	$0.132	$0.124	$0.142	$0.142	$0.138	$0.137
1,000 400 55%		$0.091	$0.091	$0.095	$0.102	$0.094	$0.111	$0.110	$0.107	$0.105
1,000 650 89%		$0.080	$0.080	$0.084	$0.091	$0.083	$0.099	$0.098	$0.095	$0.093
732 50,000 15,000 41%		$0.075	$0.076	$0.080	$0.084	$0.078	$0.088	$0.097	$0.093	$0.079
733 50,000 25,000 68%		$0.068	$0.067	$0.071	$0.075	$0.069	$0.079	$0.079	$0.076	$0.070
50,000 32,500 89%		$0.057	$0.065	$0.066	$0.071	$0.065	$0.072	$0.071	$0.068	$0.066

	Fig.	2011	2012	2013	2014	2015	2016	2017	2018	2019
Residential disconnections	31									
for non-payment		20,088	19,585	17,271	15,824	15,011	12,689	11,900	8,232	7,854
notices sent (000)		454	454	460	480	455	438	446	458	448
disconnections by month										
Jan		1,408	1,875	1,466	354	863	835	1,304	22	483
Feb		866	1,560	1,284	219	323	912	1,456	415	881
Mar		2,018	1,806	1,418	1,084	1,411	1,068	1,132	928	776
Apr		1,751	1,655	1,892	1,653	1,635	953	817	861	786
May		1,748	1,571	1,580	1,665	1,318	740	1,150	1,253	628
Jun		1,711	1,339	1,145	1,635	1,393	872	962	997	726
Jul		1,482	1,029	1,323	1,353	907	885	854	801	628
Aug		1,914	1,644	1,196	1,437	1,262	1,185	1,323	808	684
Sep		1,607	1,471	1,061	1,425	908	951	745	406	691
Oct		1,436	1,553	1,365	1,341	1,158	939	1,026	619	677
Nov		1,211	1,107	796	452	999	930	804	533	456
Dec		925	963	732	1,192	819	403	327	589	438
Accounts in arrears	32									
Jan		4.0%	3.0%	2.7%	2.8%	2.8%	2.9%	2.6%	3.5%	2.8%
Feb		4.2%	2.8%		2.8%	2.9%	2.4%	2.4%	3.5%	2.8%
Mar		4.1%	2.6%	2.4%	2.5%	2.5%	2.0%	2.2%	3.2%	2.5%
Apr		3.6%	2.5%	2.1%	2.5%	2.3%	2.3%	2.5%	2.7%	2.6%
May		3.7%	2.7%	2.2%	2.7%	2.6%	2.3%	2.4%	2.3%	2.7%
Jun		3.0%	2.8%	2.7%	2.8%	2.4%	2.2%	2.4%	2.5%	3.1%
Jul		3.1%	2.3%	2.4%	2.6%	2.4%	2.4%	2.6%	2.4%	3.0%
Aug		2.7%	2.1%	2.3%	2.4%	2.1%	2.0%	2.0%	2.3%	2.3%
Sep		2.0%	2.2%	2.3%	2.2%	2.1%	1.9%	2.5%	2.5%	2.5%
Oct		2.5%	2.6%	2.5%	2.3%	2.3%	2.4%	2.6%	2.6%	3.0%
Nov		3.0%	2.7%	3.0%	3.1%	2.5%	2.7%	2.8%	2.8%	3.5%
Dec		3.3%	3.1%	3.6%	3.3%	2.9%	3.2%	3.6%	3.2%	3.6%
average		3.3%	2.6%	2.6%	2.7%	2.5%	2.4%	2.5%	2.8%	2.9%
Employee turnover	33	6.9%	5.1%	6.6%	5.5%	6.0%	5.8%	6.4%	7.9%	6.6%
Ratio data										
Energy (MWh, millions)										
Generated		15.39	13.28	14.18	14.79	12.20	12.11	12.02	12.04	10.32
Retail sales		16.84	16.76	16.80	17.51	16.56	16.81	16.69	16.63	15.71
Wholesale sales		0.65	0.25	0.67	0.68	0.19	0.02	0.03	0.114	0.008
O&M ($, millions)										
Total		$952	$958	$1,003	$1,097	$990	$1,046	$1,095	$996	$972
Production		$709	$680	$713	$793	$676	$713	$754	$688	$640
Fuel		$547	$497	$545	$614	$491	$498	$517	$506	$471
Transmission		$20	$22	$29	$31	$36	$44	$46	$45	$50
Distribution		$44	$48	$48	$44	$41	$44	$50	$55	$58
Customer		$19	$21	$23	$22	$20	$19	$18	$18	$19
A&G		$161	$178	$183	$203	$212	$221	$221	$185	$202

Fig. 2011 2012 2013 2014 2015 2016 2017 2018 2019

MED Data

DATE	SAIDI	SAIFI
5/29/2011	17.72	0.0434
5/30/2011	2.83	0.0115
5/31/2011	0.27	0.0035
6/4/2011	98.80	0.0976
6/5/2011	19.47	0.0137
6/6/2011	4.46	0.0097
6/7/2011	1.15	0.0050
6/8/2011	0.62	0.0052
6/9/2011	2.40	0.0167
7/1/2011	13.55	0.0446
7/2/2011	2.83	0.0134
7/3/2011	0.16	0.0011
7/11/2011	17.71	0.0537
7/12/2011	0.42	0.0034
7/13/2011	0.42	0.0070
7/22/2011	24.47	0.0545
7/23/2011	4.56	0.0129
7/24/2011	1.78	0.0091
7/25/2011	0.27	0.0033
11/29/2011	24.10	0.0438
11/30/2011	7.41	0.0104
12/1/2011	0.12	0.0006
6/29/2012	53.75	0.0780
6/30/2012	7.13	0.0191
7/1/2012	7.34	0.0279
7/2/2012	0.30	0.0034
7/5/2012	22.23	0.0548
7/6/2012	1.90	0.0057
7/7/2012	0.29	0.0048
7/18/2012	20.08	0.0535
7/19/2012	6.39	0.0281
7/20/2012	0.10	0.0007
7/24/2012	100.66	0.1670
7/25/2012	3.13	0.0074
7/26/2012	1.49	0.0064
8/4/2012	93.59	0.1400
8/5/2012	6.67	0.0135
8/6/2012	0.25	0.0018
8/7/2012	0.13	0.0007

DATE	SAIDI	SAIFI
6/12/2013	40.36	0.0965
6/13/2013	5.55	0.0126
6/14/2013	0.18	0.0011
6/24/2013	176.66	0.2160
6/25/2013	38.61	0.0457
6/26/2013	12.42	0.0119
6/27/2013	51.30	0.0736
6/28/2013	7.75	0.0257
6/29/2013	0.99	0.0061
11/17/2013	88.40	0.1684
11/18/2013	5.06	0.0086
11/19/2013	0.87	0.0054
11/20/2013	0.16	0.0012
11/21/2013	0.29	0.0024
3/12/2014	30.90	0.1174
3/13/2014	0.09	0.0007
5/11/2014	31.01	0.0628
5/12/2014	6.78	0.0114
5/13/2014	0.73	0.0039
5/14/2014	0.10	0.0010
6/30/2014	202.78	0.2132
7/1/2014	168.11	0.1271
7/2/2014	9.63	0.0098
7/3/2014	3.69	0.0121
7/4/2014	0.87	0.0050
7/5/2014	0.15	0.0006
9/20/2014	11.17	0.0318
9/21/2014	1.84	0.0089
9/22/2014	0.21	0.0010
10/31/2014	40.66	0.0742
11/1/2014	0.72	0.0017
11/2/2014	0.14	0.0009

DATE	SAIDI	SAIFI
2/1/2015	15.65	0.0543
2/2/2015	0.24	0.0012
7/18/2015	18.40	0.0446
7/19/2015	0.74	0.0027
12/28/2015	85.89	0.1257
12/29/2015	3.88	0.0061
12/30/2015	0.97	0.0049
12/31/2015	0.05	0.0002
2/19/2016	9.83	0.0499
2/20/2016	0.28	0.0017
2/21/2016	0.02	0.0002
2/24/2016	56.44	0.1050
2/25/2016	3.65	0.0104
2/26/2016	0.15	0.0011
7/21/2016	9.25	0.0449
7/22/2016	0.68	0.0031
12/4/2016	15.37	0.0479
12/5/2016	1.11	0.0093
1/10/2017	13.44	0.0584
1/11/2017	0.81	0.0042
3/8/2017	8.78	0.0452
3/9/2017	0.05	0.0003
7/4/2018	16.10	0.0420
7/5/2018	8.37	0.0278
7/6/2018	0.39	0.0019
7/7/2018	0.08	0.0007
7/8/2018	0.45	0.0024
9/25/2018	14.20	0.0447
9/26/2018	1.19	0.0065
10/20/2018	12.76	0.0377
10/21/2018	0.13	0.0009
11/26/2018	41.65	0.0892
11/27/2018	0.13	0.0004
11/28/2018	0.06	0.0006

DATE	SAIDI	SAIFI
2/12/2019	17.59	0.0553
2/13/2019	0.18	0.0014
5/23/2019	41.01	0.0891
5/24/2019	0.78	0.0048
5/25/2019	0.10	0.0005
6/26/2019	7.88	0.0297
6/27/2019	3.42	0.0167
6/28/2019	0.29	0.0027
8/18/2019	25.03	0.0594
8/19/2019	0.50	0.0026
8/20/2019	0.22	0.0013
9/3/2019	9.07	0.0360
9/4/2019	0.06	0.0005
9/27/2019	25.46	0.0676
9/28/2019	1.30	0.0037
9/29/2019	0.74	0.0040
10/21/2019	66.08	0.1229
10/22/2019	3.18	0.0063
10/23/2019	0.38	0.0036
10/24/2019	0.19	0.0012
11/27/2019	12.52	0.0530
11/28/2019	0.21	0.0021